

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

JOSE BOTERO

NO. 18-16767 MDC  
CHAPTER 13  
HEARING: January 22, 2019

**NOTICE OF MOTION, RESPONSE DEADLINE  
AND HEARING DATE OF JANUARY 22, 2019 at 10:30 AM**

Ford Motor Credit Company, LLC has filed with the US Bankruptcy Court a Motion for Relief from Stay Regarding a 2016 FORD EXPLORER Motor Vehicle.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult with an attorney.)**

1. If you do not want the Court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then **on or before JANUARY 13, 2019** you or your attorney must do all of the following things:

- (a) **FILE AN ANSWER** explaining your position at:  
Clerk, United States Bankruptcy Court  
Robert N C Nix Building  
900 Market Street, Suite 400  
Philadelphia, PA 19107-4299

If you mail your answer to the Bankruptcy Court Clerk's Office for filing, you must mail it early enough so that it will be received on or before the date stated above;  
**AND (b) MAIL A COPY** of the documents to the Movant's attorney:

Howard Gershman, Esquire  
Gershman Law Offices, PC  
610 York Road, Ste. 200  
Jenkintown, PA 19046  
Telephone No. 215.886.1120  
Facsimile No. 215.886.1118

2. If you or your attorney do not take these steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.

3. A **HEARING ON THE MOTION** is scheduled to be held before the Hon. Magdalene D. Coleman on **JANUARY 22, 2019 at 10:30 AM** in Courtroom No. 2 United States Bankruptcy Court, Robert Nix Federal Building, 900 Market Street, 2<sup>nd</sup> Floor, Philadelphia, PA 19107.

4. If a copy of the Motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Court Clerk's office at (215) 408-2800 to find out whether the hearing has been canceled because no one filed an answer.

DATE: December 26, 2018